

EXHIBIT 36

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

STATE OF MARYLAND; STATE OF
DELAWARE; STATE OF CALIFORNIA; STATE
OF COLORADO; STATE OF ARIZONA; STATE
OF CONNECTICUT; DISTRICT OF COLUMBIA,
STATE OF HAWAI‘I; STATE OF ILLINOIS;
OFFICE OF THE GOVERNOR *ex rel.* Andy
Beshear, in his official capacity as Governor of the
COMMONWEALTH OF KENTUCKY; STATE OF
MAINE; COMMONWEALTH OF
MASSACHUSETTS; PEOPLE OF THE STATE OF
MICHIGAN; STATE OF MINNESOTA; STATE OF
NEVADA; STATE OF NEW JERSEY; STATE OF
NEW MEXICO; STATE OF NEW YORK; STATE
OF NORTH CAROLINA; STATE OF OREGON;
JOSH SHAPIRO, in his official capacity as
Governor of the COMMONWEALTH OF
PENNSYLVANIA; STATE OF RHODE ISLAND;
STATE OF VERMONT; STATE OF
WASHINGTON; STATE OF WISCONSIN;

Plaintiffs,

v.

CORPORATION FOR NATIONAL AND
COMMUNITY SERVICE, operating as
AmeriCorps; and JENNIFER BASTRESS
TAHMASEBI, in her official capacity as Interim
Head of the Corporation for National and
Community Service;

Defendants.

Civ. No. 25-cv-01363 (DLB)

DECLARATION OF BRIAN DARROW

Pursuant to 28 U.S.C. § 1746, I, Brian Darrow, hereby declare as follows:

1. I am a resident of the State of Rhode Island. I am over the age of 18 and have personal knowledge of all the facts stated herein, including as based on my experience and information provided to me. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by the Rhode Island Department of Elementary and Secondary Education (“RIDE”) as Chief of Innovation, Improvement, and Data.

I. Background on ServeRI & its Relationship to AmeriCorps

3. RIDE is responsible for managing the Funds received from AmeriCorps the Federal Agency.

4. As the Chair of the Rhode Island Commission for National and Community Service, known as ServeRI, I have accountability for oversight of the Federal Grants received from AmeriCorps the Federal Agency.

5. ServeRI fosters the development of service activities in the state and carries out on behalf of the state the objectives of the federally enacted National and Community Service Act of 1990, as amended. RIDE administers ServeRI to award AmeriCorps grants to organizations responding to local needs. ServeRI encourages and facilitates voluntary services to meet community needs by utilizing the energy, talents, and compassion of Rhode Island’s residents, thus helping to bring about a renewal of the ethic of citizenship in the state.

6. Comprised of a Governor-appointed advisory board, ServeRI is housed within the Office of College and Career Readiness (“OCCR”) at RIDE. The director of the OCCR serves as the Executive Director, and the National and Community Service Program Specialist manages AmeriCorps grants and state service plans. ServeRI leads a competitive process annually,

supported by RIDE's staff and agency procedures, for local organizations to apply for AmeriCorps State and National grants. The Commission Members approve applications, and RIDE is responsible for managing the Funds received from AmeriCorps the Federal Agency.

7. ServeRI receives and manages Prime Grants from AmeriCorps, awards and disburses subgrants from the Primes, monitors subgrantees for performance and compliance with grant requirements, provides training and technical assistance for subgrantees, and functions as a liaison between AmeriCorps and subgrantees. ServeRI manages two separate types of grants involving AmeriCorps Corporation discretionary funds and nondiscretionary funds. First is competitive funding. In this process ServeRI issues Requests for Proposals (RFP) that are based on federal Notices of Funding Opportunity (NOFO) issued by AmeriCorps. Grant applicants submit application materials in response to the RFP, and AmeriCorps exercises its discretion in approving grant applications. Second is formula funding. In this process ServeRI receives Congressionally appropriated money from AmeriCorps, and ServeRI selects the subgrantees for this money.

8. Subgrantees use the funds they receive from ServeRI to run programs to benefit Rhode Islanders. The money is used to recruit, manage, pay, and train AmeriCorps members and handle program operations and costs, monitor and support host sites to ensure compliant and effective service. Many subgrantees then post AmeriCorps members at partner organizations called host sites. The host sites typically provide service sites for members and supervise regular service, and verify hours and performance measures.

9. Prior to the events of April 25, 2025, ServeRI managed grants for 10 subgrantees, including Children's Friend and Service, Highlander Charter School, Farm Fresh Rhode Island, Girl Scouts of Southeastern New England, Refugee Youth Solidarity through Education, Save The

Bay, Skills for Rhode Island's Future, Teach for America, TerraCorps, and Woonsocket Neighborhood Development Corporation.

10. The AmeriCorps programs administered and supported by ServeRI play a crucial role in community development. Last year, over 2,900 Americans united to meet local needs and strengthen neighborhoods with AmeriCorps investing more than \$6.7 million in federal funding. These service members work across Rhode Island at more than 100 locations—supporting schools, food banks, homeless shelters, youth centers, veterans' facilities, and other essential community institutions. Their efforts not only fortify community resilience but also generate over \$2.6 million in additional local resources from businesses, foundations, public agencies, and other sources in Rhode Island.

11. **FY24 Performance Snapshot:** The following table summarizes the performance of various AmeriCorps programs in FY24, which underscores the scale and impact of these community service efforts:

Program	Projects	Service Locations	Completed Participants	Education Awards	Federal Funding
AmeriCorps National	8	18	176	\$554,412	\$1,728,173
AmeriCorps NCCC	2	2	17	\$0	\$0
AmeriCorps State	11	48	102	\$620,082	\$1,091,396
AmeriCorps VISTA	6	7	12	\$83,740	\$283,984
AmeriCorps Seniors Foster Grandparents	3	40	121	N/A	\$1,048,222
AmeriCorps Seniors RSVP	6	62	2,063	N/A	\$474,327
AmeriCorps Seniors Senior Companion	1	11	81	N/A	\$444,648
AmeriCorps Seniors Senior Demonstration	2	6	404	—	\$179,000
AmeriCorps National Planning Grant	1	—	—	—	\$79,750
AmeriCorps State Planning Grant	2	—	—	—	\$122,363

II. Recent Facts impacting ServeRI

a. Reductions of AmeriCorps administrative staff

12. On April 16, 2024, a ServeRI employee received an email from Richard Smith at the Southern Region AmeriCorps NCCC notifying ServeRI of the demobilization of AmeriCorps NCCC. This email confirmed knowledge ServeRI employees had already learned from media outlets and personal networks.

13. ServeRI did not receive any communications from AmeriCorps regarding changes or reductions in staff positions. Through media reports I learned that approximately 85% of AmeriCorps national and regional staff were placed on administrative leave.

14. Because all staff working at the Northeast Regional office of the Office of Regional Operations center in New Hampshire work remotely, I am not aware if anyone still has an assignment in our region. To my knowledge, none of ServeRI's prior contacts have been responsive or reachable by email.

b. Termination of AmeriCorps programs and grants

15. On April 25, 2025, RIDE received a termination notice with an attached list of subgrants, listing all of ServeRI's commission AmeriCorps State and National grants.

16. Specifically, the notice state that:

Effective immediately, the AmeriCorps award subrecipient(s) included in the attached spreadsheet is/are being terminated per 2 CFR 200.340(a)(4) because it has been determined that the award no longer effectuates agency priorities. You must immediately cease all award activities. This is a final agency action and is not administratively appealable.

17. The notice further directs that, as to AmeriCorps State and National Programs:

State commissions and prime grantees should immediately notify subgrantees, operating sites, and members and follow grant close-out procedures. All member activities should cease immediately. Members should be exited for compelling personal circumstances

(CPC). The program should document that the member was exited for compelling personal circumstances due to the agency's termination of the grant and program closure.

18. According to ServeRI records and my understanding of the April 25th notice, this communication terminated programs and grants that total \$1, 760, 206 in grant funding and affected all 10 of ServeRI's active subgrants.

19. A list of the affected programs is as follows:

Project	Grant Amount	Spent March 31, 2025	Balance
TerraCorps, Inc.	\$300,000.00	\$160,252.50	\$139,747.50
Children's Friend and Service	\$100,880	\$39,561.11	\$61,318.89
The Highlander Charter School	\$104,000.00	\$51,358.00	\$52,642.00
Teach For America Inc	\$50,000.00	\$26,944.01	\$23,055.99
Farm Fresh Rhode Island	\$130,000.00	\$58,520.54	\$71,479.46
The Woonsocket Neighborhood Development Corporation	\$52,000.00	\$12,063.24	\$39,936.76
The Woonsocket Neighborhood Development Corporation,	\$292,902.00	\$144,929.48	\$147,972.52
RI Department Of Elementary and Secondary Education	\$149,895.00	\$0.00	\$149,895.00
Refugee Youth Solidarity Through Education (RYSE)	\$100,100.00	\$21,048.14	\$79,051.86
The Equity Institute*	\$37,187.00	\$25,012.96	\$12,174.04
Skills for Rhode Island's Future	\$156,000.00	\$45,996.21	\$110,003.79
Girl Scouts of Southeastern New England	\$53,242.00	\$6,206.10	\$47,035.90
Save the Bay, Inc.	\$234,000.00	\$120,244.32	\$113,755.68

Total	\$1,760,206.00	\$712,136.61	\$1,048,069.39
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* The Equity Institute notified ServeRI it would self-terminate its grant as of March 31, 2025.

20. As of March 31, 2025, \$1,048,069.39 remained on the programs' existing grants. The current grants were scheduled to end on either July 31, 2025, or August 31, 2025. The notice also stated:

AmeriCorps staff will initiate an amendment to change the end date of the period of performance effective immediately.

21. As the Prime grant recipient, RIDE pays subgrantees and draws down federal funds to reimburse the state. The Payment Management System has been reported to work at this time and the notice stated that closing costs can be claimed.

22. As of April 27, 2025, RIDE was still reviewing the termination letter and had not told AmeriCorps members to cease work.

III. Irreparable Harms have been caused by these actions.

c. Seasonal programs will shut down.

23. The timing of the AmeriCorps grant terminations will shutter summer education opportunities for some Rhode Island youth. Absent replacement funding, the following programs will shut down:

- a. Refugee Youth Solidarity through Education ("RYSE") – a Rhode Island-based nonprofit that fosters literacy, confidence, and community among K-12 refugee youth through hands-on, joyful summer learning and leadership development – recruited 13 AmeriCorps members to serve as educators for Camp RYSE, a five-week summer day camp that provides free literacy, STEM, and enrichment activities to more than 100 multilingual learners,

ages 5-14. AmeriCorps members facilitate literacy and STEM instruction, lead educational and enrichment activities, and evaluate campers' academic progress.

- b.** Highlander Charter School deploys AmeriCorps members throughout the school year as academic and attendance coaches and for a six-week summer education program during which AmeriCorps members serve 7.5 hours a day to help manage summer programming and deliver project-based service-learning instruction where students apply developing reading and math skills.
- c.** Save the Bay AmeriCorps members are currently scheduled to deliver STEM lessons at schools and after school programs, as well as field trips to Save the Bay facilities before the end of the school year and then operate full-day summer education programming. The organization feels compelled to follow the AmeriCorps termination notice and immediately exit the members. If Save the Bay is unable to quickly hire and train new educators, the organization will cancel services for thousands of Rhode Island students.

24. The grant terminations will also shut down seasonal programming targeted at improving nutritional outcomes for Rhode Islanders.

- a.** Farm Fresh Rhode Island is a nonprofit organization that seeks to grow a local food system that values the environment, health, and quality of life of the farmers and eaters. From spring through August, AmeriCorps members serve during the busy growing season, adding to their responsibilities

nutrition education at farmer's markets across the state and enrolling Rhode Islanders in incentive programs to purchase fresh and healthy foods with SNAP benefits. This season four AmeriCorps members attending at least three markets each week would reach 3,000 Rhode Islanders.

d. Unrecoverable money damages

25. AmeriCorps members earn the Segal AmeriCorps Education Award upon successfully completing their service, which has historically supported the educational pursuits of thousands of Rhode Islanders. Since 1994, more than 8,700 Rhode Island residents have contributed approximately 13 million hours of service and earned awards totaling more than \$31.5 million. Higher education institutions and other organizations in Rhode Island have received more than \$13.7 million to enhance the state's educational landscape. In one year from 2023 to 2024, Rhode Island higher education institutions received approximately \$300,000.

26. While the AmeriCorps agency has written it will provide the Segal Education Award to existing members at a prorated rate determined by the hours served before April 25, 2025, this represents a loss of \$247,177.38 of promoted scholarship funds. Because terminated AmeriCorps members are ineligible for unemployment, they will also be without income, lose their health insurance if provided by their program, and become ineligible for student loan forbearance benefits.

27. AmeriCorps programming also impacts the Rhode Island workforce. Recent research shows the majority of AmeriCorps members who served in Rhode Island remain working in the state up to three years post-service, contributing to a net "brain gain," with well qualified employees from both in-state and out-of-state contributing to the Rhode Island workforce. There is a particular impact in the field of education, with AmeriCorps service acting as a pipeline to

teaching and other youth developments jobs. This is demonstrated by the 55% of AmeriCorps alumni from the past five years who went on to work in education.

28. Through the Accessing Home AmeriCorps Program led by the Woonsocket Neighborhood Development Corporation, twelve AmeriCorps members annually earn or recertify as Resident Services Coordinators, allowing them to qualify for paid positions in public housing. Due to the termination, members will not be able to finish their training, earn this credential, and progress in this career path.

29. Some AmeriCorps members who have moved to the state for this service opportunity, are likely to return home instead of staying in the state and contributing to the Rhode Island economy.

e. Administrative costs and burdens imposed on ServeRI

30. Federal legislation provides that the AmeriCorps agency manages a formula-based Commission Support Grant for each state commission across the country to administer the commission and AmeriCorps subgrants. In addition, Congress directs a formula-based Commission Investment Fund for commissions to increase capacity to deliver technical assistance to national and community service programs. ServeRI submitted applications for these two non-competitive grants for FY 2025 but has not been notified about their status.

31. For FY 2024 ServeRI was awarded a Commission Support Grant for \$295,000 in new funds. In proactively managing the award, ServeRI sought a no cost extension through June 6, 2026, which was awarded by amendment on April 4, 2025. The Commission Support Grant provides staffing and technology systems for program quality assurance and monitoring of AmeriCorps programs meeting the statutory requirements of the National and Community Service

Trust Act and state authorization of the commission. Some specific expenditures and initiatives include:

- a. Outreach and administration of the AmeriCorps Competitive and Formula grant process that resulted in thirteen new applicant organizations and ten returning applicants in FY2024.
- b. Successfully completing a site visit from the AmeriCorps agency Office of Monitoring, responding to IPERA requests, and AmeriCorps member National Service Trust eligibility monitoring requests.
- c. Production of a **research report, supported by the Rhode Island Longitudinal Data System, that demonstrated** the impact and of **AmeriCorps** on Rhode Island communities.
- d. **Promotion of the AmeriCorps agency and service opportunities in Rhode Island through a robust advertising campaign on radio, streaming platforms, social media, and online reaching hundreds of thousands of Rhode Islanders to date and impacting a 30% growth in the commission's AmeriCorps programs' enrollment rate coming out of the COVID pandemic.**
- e. Providing additional benefits to AmeriCorps members in service, specifically the Member Assistance Plan whereby members can access mental health counseling and referrals for housing, legal, and other forms of assistance.
- f. Partnered with the Rhode Island Department of Education Office of Instruction Assessment and Curriculum to include youth service in teacher

guidance, as well as support teacher ambassadors to model high-quality civic and service instructional practices.

- g.** Acting as a certifying agency for the President's Service Awards program.

32. The Commission Investment Fund ("CIF") grant awarded \$406,471 in new funds for an 18-month budget period. There were additional funds provided due to the agency changing its awards from a calendar year to a July-June budget period in FY2025. In proactively managing the award, ServeRI sought a no cost extension through June 30, 2026, which was awarded by amendment on March 27, 2025. The CIF award enhances the commission's capacity to deliver training and technical assistance to subgrantees and to promote a positive AmeriCorps member experience. Some specific expenditures and initiatives include:

- a.** Funds a full-time contractor for subgrantee and member support – the National and Community Service Program Associate – who provides one to one support to subgrantees and designs trainings and events. In total there were 19 training sessions in 2024 and 29 documented one to one grantee meetings.
- b.** Provides training to AmeriCorps programs during the monthly AmeriCorps RI Network Meeting, including hosting the AmeriCorps Office of Inspector General to train AmeriCorps grant recipients on how to protect against fraud, waste, and abuse.
- c.** Funds a Start Strong summer training program and Award Readiness desk review to ensure AmeriCorps grant recipients are prepared to comply with AmeriCorps grant guidance and member enrollment procedures.

- d. Produces an Opening Day Event, bringing AmeriCorps members from across the state to take a pledge of AmeriCorps service.
- e. Engagement with the AmeriCorps members and communities in the Martin Luther King, Jr. National Day of Service. On January 20, 2025, more than 90 volunteers prepared 20,000 shelf-stable meals for delivery to food pantries in Providence, RI. It was the third consecutive year that the service day brought focus to hunger in Rhode Island, now totaling 60,000 meals.
- f. Subscription to an online learning system that permits ServeRI to offer free, high-quality training on AmeriCorps program design and regulations for organizations considering a grant application, current staff managing AmeriCorps grants, and AmeriCorps members.

33. On April 14, 2024, RIDE, on behalf of ServeRI, submitted FY2025 Commission Support Grant and Commission Investment Fund Grant applications. The formula-based allocation reported by the AmeriCorps agency was \$295,000 and \$166,136 respectively. On April 14, 2025, ServeRI received an email from AmeriCorps confirming the receipt of all required documents for the FY2025 Commission Support Grant application.

34. Since then there has been no communication from the agency regarding the FY 2025 awards. The status of the applications in the AmeriCorps grant management system, eGrants, is "Scheduled for Review," which is several steps prior to award status.

35. As soon as July 1, 2025, RIDE may need to eliminate the position of National and Community Service Program Specialist and cancel contracts for fiscal monitoring, technical assistance, and supports for AmeriCorps programs and member professional development.

f. Detraction from the Mission of ServeRI

36. ServeRI was codified in Rhode Island state law, Public Law 2024 Chapter 098, for the purpose of “carry[ing] out on behalf of the State of Rhode Island the objectives of the National and Community Service Act of 1990.” Under its enabling statute, ServeRI is legally obligated to “[a]dminister a competitive process to select the national service programs to be included in any applications for funding and prepare and submit the annual state applications for federal funding of commission-selected national service programs.”

37. The AmeriCorps agency has attempted to terminate the subawards selected by the commission and previously awarded through the federal notice of funding opportunity and in full compliance with AmeriCorps agency instructions. In regard to the next program year, the AmeriCorps agency has not provided Formula funding designated by Congress for the commission to complete its responsibilities in selecting awards for federal FY 2025.

38. Timely grant review is integral to awarding funds and ensuring programs have the necessary resources to launch. Any delays in this process could shift the start dates of federally funded programs, jeopardizing the execution of certain projects. ServeRI has approved ten projects to continue in FY 2025 with 126 AmeriCorps members totaling \$2,039,119 in grant support and \$773,887 in Education Awards that face disruption if grants are not awarded. If approved these projects are slated to start August 1, 2025.

39. It is my understanding that federal and state legislation require that the commission board include an AmeriCorps agency staff member in a non-voting role, or ex officio. The AmeriCorps agency put Susan Cheesman, Senior Portfolio Manager, Office of Regional Operations on administrative leave, and provided no guidance on who or when an individual for this role would be provided. In removing Cheesman from the board and not providing a

replacement staff member, the agency has left the commission board non-compliant with federal and state law.

40. Further, the staff reductions and grant terminations taken by AmeriCorps officials have impacted ServeRI's daily operations in a way that has detracted from its mission.

41. In the spring of 2024, commission staff supported Earth Day community events led by municipalities and AmeriCorps programs; spoke at AmeriCorps graduation events to encourage a lifelong commitment to citizen service; delivered training on access to post service benefits like the Education Award; helped AmeriCorps members with resume building, applying to schools and jobs, and preparing for their next career step; assisted subgrantees to follow member exit and grant closure guidance; conducted end of year compliance monitoring including member file review and interviews; oversaw an advertising campaign to support local AmeriCorps recruitment; launched an end of year grant progress report; and prepared for a May commission board meeting, which included the review and selection of AmeriCorps Formula applications for the following year.

42. In comparison, this Spring, commission staff are seeking emergency support – including housing, food, new jobs, childcare, and healthcare – for AmeriCorps members in jeopardy of being released from service and ineligible for unemployment assistance; studying AmeriCorps legislation and grant terms to respond to AmeriCorps agency challenges; waiting hours or days for support from the National Service Hotline or AmeriCorps agency staff to grant and finance reporting issues; providing technical assistance to AmeriCorps Seniors, VISTA, and other programs not under commission management but bereft of AmeriCorps agency assistance; adapting to cancelled federal contracts at the AmeriCorps agency; engaging legal counsel and coordinating with State office; drafting shut down guidance for subgrantees; and unable to develop a workplan or enter contracts for future goods or services due to uncertainty. Additionally,

recruitment activities for the upcoming year have been halted due to the lack of understanding of current and future funding.

g. Inability to contact and confer with Regional/Main Offices

43. Approximately 116 staff are left at the AmeriCorps Agency of the approximately 650 staff, according to the Association of State Service Commissions from anonymous agency source.

44. It is my understanding that the Office of Regional Operations currently has 24 active staff who are the primary contacts for all AmeriCorps grant recipients, including state commissions.

45. It is also my understanding that in the Northeast region – supporting New England and New York – there is one regional staff person in an Acting Regional Administrator role. I have not learned this through any formal agency notice and have not been informed who is serving as the Acting Regional Administrator, nor have I been informed by the AmeriCorps agency how to contact active staff. The prior commission Portfolio Manager, Jay Bethke, has become nonresponsive and is presumed to be no longer working.

46. The inability to contact and confer with staff in the main and regional office has immediate impacts on grant approval, amendment approval, reporting deadlines, extension deadlines, as well as individual support and guidance. If programs are not shut down, there will still be severe repercussions from the staffing cuts regarding grant support and management deadlines.

47. A lack of regional staff support also means a lack of AmeriCorps Seniors and AmeriCorps VISTA support in the state of Rhode Island. Rhode Island sponsors participating in AmeriCorps VISTA – an antipoverty program that focuses on capacity building – have a deadline

for grant renewal on May 7, 2025. However, the AmeriCorps agency has been unresponsive to questions and has canceled a monthly grantee meeting.

48. Examples of AmeriCorps VISTA participants operating in Rhode Island without access to support or guidance from the AmeriCorps agency include: the Center for Health and Justice Transformation at Brown University Health, which sponsors six AmeriCorps VISTAs to build capacity in organizations across the state working at the intersection of incarceration, opioid use disorder, and poverty; the Rhode Island Free Clinic, which sponsors three AmeriCorps VISTAs to help build Clinic capacity and aid in patient care, including outreach initiatives and data analysis used to improve patient health outcomes; Farm Fresh Rhode Island, which sponsors two AmeriCorps VISTAs to improve donor outreach and expand access to healthy foods; and Groundwork Rhode Island, which sponsors one AmeriCorps VISTA to grow employment opportunities connected to improving the physical environment of urban communities.

49. In the absence of agency support, programs have turned to ServeRI – who has no official role at this time in support of other branches of AmeriCorps and no authority or access to grant management systems for the programs – for guidance. For example, on May 2, 2025, Meals on Wheels contacted the commission to try and understand the status of the organization’s application for an AmeriCorps Seniors RSVP grant as the notification date is past due. The lack of agency guidance for these programs has placed an increased administrative burden on ServeRI to support programs it has not authority or obligation to support.

h. Harms incurred by Rhode Island as a result of AmeriCorps’ failure to provide ServeRI with advanced notice of its plans

50. It is my understanding based on my role as Chair of the Rhode Island Commission that certain regulations limit AmeriCorps’ discretion to terminate awarded grants. Further

regulations entitle Commissions and grantees with notice and an opportunity to comment prior to implementing this type of action.

51. I affirm that, had ServeRI been accorded that process, it would have taken advantage of it.

a. Arguments we would have made against termination would have included:

- i. In the prior 2023-2024 program year in Rhode Island, the \$1,125,279 federal dollars funded by AmeriCorps were met with \$2,397,533 other local, state, and federal dollars. Additionally, ServeRI recruited 726 volunteers who provided 7,773 hours valued at \$247,181.
- ii. ServeRI's subgrantees have served 15,563 students through AmeriCorps members delivery of after-school programs, participation as student success coaches, engagement in parent education, and fulfillment of 52 classroom teaching positions in Providence County.
- iii. AmeriCorps members delivered food system, marine science, and conservation education to 8,989 individuals, and engaged 660 additional volunteers in environmental service projects.
- iv. AmeriCorps members help address housing needs by connecting 2,500 Rhode Islanders to \$1 million in housing, energy, and food assistance.

- v. AmeriCorps members help protect Rhode Island's environmental interests, with AmeriCorps members managing an additional 700 volunteers for public land and Narragansett Bay service projects.
- vi. As of 2019, Rhode Island ranks seventh among states for per capita AmeriCorps participation, and Providence ranks second in the nation among small cities.

52. Further, ServeRI's current subgrantees have a history of compliance with grant requirements.

i. Seizure by the national executive of ServeRI's discretion and authority.

53. It is my understanding that, pursuant to certain laws and regulations governing AmeriCorps, that state service commissions retain discretion and authority over how to disburse formula and pass-through funding to awards granted to each commission.

54. Funding is awarded by a structure ordered by AmeriCorps that multiplies a rate times the total number of service houses that will be completed.

55. ServeRI's overall approach to the grant decision process is to invite communities to identify local needs and develop a portfolio of programs that serve a variety of populations, geographies, and outcomes and that weigh grant management risk with investment in developing organizations deeply rooted in the communities where people are served.

56. As required by law, ServeRI develops a three-year State Service Plan that provides a vision for national and community service in Rhode Island, including a description of the state's grantmaking focus areas and priorities. The Rhode Island State Service Plan 2024-2026 focus areas were selected by examining the overlapping priorities of the Rhode Island 2030 plan, Rhode Island's Strategic Plan for Public Education, and AmeriCorps strategic plan. The grantmaking plan

identifies specific outcomes where AmeriCorps members can make significant contributions, similar to, but more narrowly defined than federal interests.

57. The Rhode Island areas are Community Building, Education, Environment, Health, and Housing. In addition to these focus areas, the Rhode Island State Service Plan seeks to prioritize grants that advance strategic goals, including proposals to create service-to-career pathways that embed career development opportunities into the service experience, proposals to expand the reach of AmeriCorps by serving many locations or managing additional community volunteers, and proposals that address the needs of underserved communities.

58. Examples of Rhode Island-specific issues considered by ServeRI include:

- a. **Out-of-school Learning Initiatives:** In April 2023, Governor Dan McKee announced a new out-of-school learning initiative, Learn365RI, which is designed to shift learning from the traditional 180 school days to 365 days of learning by supporting partnerships between municipalities, local education agencies (LEAs) and community-based organizations (CBOs) to expand high-quality, extended learning experiences. In alignment with the state's investment, ServeRI AmeriCorps grants to Farm Fresh Rhode Island, Girl Scouts of Southeastern New England, Highlander Charter School, RYSE, Save the Bay, and TerraCorps all include service roles to extend learning time in afterschool and summer programming.
- b. **Support for Multi-Lingual Learners:** It is a state-wide priority of the Rhode Island education system to better support Multi-Lingual Learners. The ServeRI AmeriCorps program with Children's Friend and Service is comprised of bilingual neighbors supporting Head Start classrooms to

improve education for kids and their families. Similarly, the RYSE AmeriCorps Program aims to increase the literacy and English proficiency of multi-lingual learners in a summer education program.

- c. **Environmental Impact:** Rhode Island's extensive coastline makes coastal health and protection a state priority. The Save the Bay AmeriCorps program prioritizes projects to restore the health of Narragansett Bay and teach students about clean water, marine animals, and careers connected to our ocean economy.

59. None of the organizations referenced above, to my knowledge, have ever been denied funding or had funding withdrawn for violating either AmeriCorps' or ServeRI's legal requirements.

60. The missions of each of these organizations are a reflection of ServeRI's independent discretionary authority. To my understanding, ServeRI was legally entitled to exercise that authority under AmeriCorps enabling statutes and required to exercise it under Rhode Island law.

j. ServeRI reasonably relied on its historical partnership with AmeriCorps.

61. Reputational harms to AmeriCorps consequently impact ServeRI. Since April 25, 2024, the most consistent question ServeRI has received across the service network is: what is the likelihood of funding next year given the current grant terminations? ServeRI's ten current subgrantees were looking to continue with funding for next year, but will now likely drop out of the application process. As a result, the termination notice is effectively causing two years of program termination.

62. ServeRI focuses on AmeriCorps as a pathway to careers by offering exploration in nonprofit organizations, skill development, certification, transition support, and the Segal Education Award. In the current environment, the proposal of a career in public service gathers less appeal due to the public news of federal firings and reduced public and private funding for social services.

63. Additionally, because of grant terminations, ServeRI will lose all of its returning AmeriCorps members. ServeRI has, in some years, seen more than half of Rhode Island AmeriCorps members continue for a second year of service. While this is automatic for Teach for America participants who enter with a two-year commitment, last year both Children's Friend and Service and Woonsocket Neighborhood Development Corporation had more than half of their members return for a second year. Continuing members provide more service expertise, mentor new members, and reduce recruitment needs.

64. Further, AmeriCorps alumni are the most powerful tool for recruitment, with most members identifying that they learned about the program from word of mouth. The recent termination notices disrupting the current program cycle and exiting members prematurely from their programs will make recruitment all but impossible.

65. Uncertainty about grant continuance will pause planning, prevent collaboration with organizations where members are placed, and harm recruitment for programs that cannot be certain they can offer new AmeriCorps positions. Additionally, donors and philanthropy, who AmeriCorps grant recipients rely on to raise additional private funding to implement programs and match federal funding awards, are less likely to commit to AmeriCorps during this uncertainty.

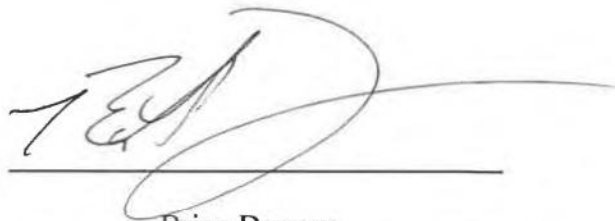
IV. IV. Conclusion

66. It is my firm declaration that the reduction in AmeriCorps Federal Agency staffing and grant terminations present a serious threat to the operational integrity of ServeRI. The potential delays in grant reviews and program awards could have a devastating impact on Rhode Island's communities and the individuals dedicated to service. Additionally, AmeriCorps recent termination of current program awards poses an injurious deprivation of critical resources across Rhode Island, with imminent impact felt by seasonal programs.

67. AmeriCorps programs are vital lifelines for communities across Rhode Island. Terminating these programs will not only disrupt services to schools, food banks, shelters, and other critical community outlets, but will also adversely affect the AmeriCorps members and seniors who rely on timely engagement and support. The ripple effect of these delays will undermine community resilience and erode the trust and benefits built over years of service collaboration

68. ServeRI stands ready to work collaboratively with federal and state partners to mitigate these risks and safeguard the continued success and outreach of the AmeriCorps program.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct. Executed on May 5, 2025, at Providence, Rhode Island.

A handwritten signature in black ink, appearing to read 'B. Darrow', is written over a horizontal line.

Brian Darrow
Chair of the R.I. Commission for National and
Community Service, d/b/a ServeRI, and as Chief for
Innovation, Improvement and Data & Technology
Services at RIDE